

# Kramer Levin

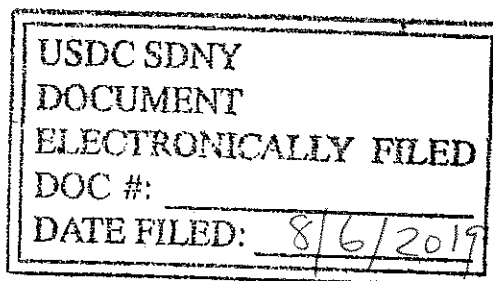
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July 26, 2019

Via ECF & Hand Delivery

The Honorable Denise Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007



Re: **Novartis Vaccines and Diagnostics, Inc. et al. ("Novartis") v. Regeneron Pharmaceuticals, Inc. ("Regeneron"), No. 18-cv-2434 (DLC) (S.D.N.Y.)**

Dear Judge Cote:

Pursuant to the Court's Individual Practice Rule 4.A, Regeneron respectfully requests that Exhibits 1 and 2 to the Declaration of Irena Royzman in support of Regeneron's Responsive Markman Brief Regarding Additional Claim Terms be filed under seal. The documents contain highly proprietary information, as set forth below.

- Exhibit 1, the Expert Report of Kathryn Calame, Ph.D., because it discusses in detail highly sensitive commercial and proprietary information concerning Regeneron's product that is not otherwise publicly available, and is designated as "Highly Confidential" pursuant to the Protective Order in this litigation (see Dkt. 064).
- Exhibit 2, the Rebuttal Report of Kathryn Calame, Ph.D., because it discusses in detail highly sensitive commercial and proprietary information concerning Regeneron's product that is not otherwise publicly available, and is designated as "Highly Confidential" pursuant to the Protective Order in this litigation (see Dkt. 064).

Sincerely,

/s/ Irena Royzman

Granted.  
Denise Cote  
8/6/19

**MEMO ENDORSED**